

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

ADRIANA ORNELAS, as)
Administrator of the Estate)
of RODOLFO ROMO, Deceased,)
Plaintiff,)
v.) Case No. 15-cv-547
THE UNITED STATES OF AMERICA and)
TOTALL METAL RECYCLING, INC.)
Defendants.)

MOTION TO ENFORCE SETTLEMENT

Comes now the plaintiff, by and through her attorney, **THOMAS Q. KEEFE, JR., KEEFE, KEEFE & UNSELL, P.C.**, and prays this Court for an Order enforcing settlement, and as grounds states:

1. That on December 29, 2016 this case was settled.
2. That on December 30, 2016 this Court gave the parties 90 days to consummate the settlement.
3. That on March 30, 2017 the defendants advised they required still more time to consummate the settlement.
4. That all delays in the completion of this settlement have been the result of failures by defendant and third party defendant to agree on releases; plaintiffs have signed everything they have been asked to sign as soon as presented to them.

5. That defendant and third party defendant now seek additional time to consummate this settlement and the stated reason is that third party defendant TMR continues to be recalcitrant and obstreperous in concluding this matter.

6. That the family of Rodolfo Romo has been without a husband and bread winner since the date of this accident, and plaintiff respectfully submit that a case settled more than five months ago should have been paid long before today's date.

WHEREFORE, plaintiff prays for Order compelling defendants to comply with the settlement agreement and pay plaintiffs their money instanter.

s/Thomas Q. Keefe, Jr.

THOMAS Q. KEEFE, JR.
Ill. Reg. No. 03123416
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2017, I electronically filed the foregoing document with the Clerk using the CM/ECF system which will send notification of such filings to the following:

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